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**DIGEST OF OTHER RECENT VIRGINIA DECISIONS.**  
**Supreme Court of Appeals.**

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**NOTE.**—In this department we give the syllabus of every case decided by the Virginia Supreme Court of Appeals, except of such cases as we report in full.

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**WRIGHT'S TRUSTEES v. WRIGHT et al.**

June 15, 1905.

[51 S. E. 151.]

**TRUSTS—DEED—CONSTRUCTION—DETERMINATION OF BENEFICIARIES.**

A deed conveyed land to a trustee to hold the same during the natural life of a woman, for the joint use and benefit of herself and her present and future children, and provided that on the woman's death the property should be conveyed to such person as she might appoint by her will, and that, should she die without making a will, the trustee should convey the property in fee simple to her husband, but in case of his death the property should be conveyed in fee simple to such of his children as might then be alive; and full power was given the trustee, with the woman's consent, to sell the property and invest the proceeds for the trust purposes. *Held*, that the woman's children were entitled to share jointly and equally with her during her life in the profits from the trust property.

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**WINFREE v. JONES.**

June 15, 1905.

[51 S. E. 153.]

**BANKRUPTCY—PROVABLE CLAIMS—TORTS—UNLIQUIDATED DAMAGES—NEGLIGENCE—PROXIMATE CAUSE.**

1. A claim for damages against a lessee for abandoning the house, so that it was wrongfully entered, burned and destroyed, was not a provable claim in bankruptcy proceedings, under Act Cong. July 1, 1898, c. 541, 30 Stat. 544 [U. S. Comp. St. 1901, p. 3418].

2. Where a lessee abandoned the house during the term and left it unlocked, and another entered and set fire to it, whereby it was destroyed, the lessee was not liable for the destruction of the house.

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**PEOPLE'S NAT. BANK v. VIRGINIA TEXTILE CO. et al.**

June 15, 1905.

[51 S. E. 155]

**RECEIVERS—EFFECT OF APPOINTMENT ON EXISTING LIENS—DEBTS INCURRED BY RECEIVER—DETERMINATION—DECREE.**

1. Where a receiver is appointed at the instance and for the benefit of lien creditors, and charged with the duty of operating the property for